

How to Build and Maintain the Public's Trust:

Practical Ethics and the Law

Institute for Local Government
New Mayors and Council Academy
January 20, 2017

PRESENTED BY

Gage C. Dungy, Partner, Liebert Cassidy Whitmore
Eric S. Vail, Partner, Burke, Williams & Sorensen, LLP

www.ca-ilg.org



Why Is This Training Important?



- Comply with the law
- Learn best practices
- Promote positive public perceptions
- Avoid legal problems

www.ca-ilg.org



HEADLINE NEWS

Court Orders Greater Transparency
From UC On Investments

DA Charges Five School
Officials In Corruption Case

Construction Executive Pleads
Guilty In School Corruption Case

Delegate Reprimanded For Conflict Of Interest

Superintendent of Schools Encouraged
Board Member To Resign

www.ca-ilg.org



HEADLINE NEWS

Exec Conducted Private Business On The Job

Attorney Pleads Guilty In California
Hospital Kickback Scheme

**Official's girlfriend recounts globetrotting years
on stand in corruption trial**

Santa Clara County Ex-supervisor Pleads Guilty

Gov. Corruption Exposed In Anaheim –
Purge Documents Before Public Sees Them

www.ca-ilg.org



HEADLINE NEWS

Audit Reveals Forged Check Warrants, Personal Use Of Government Funds By City Officials, Personal Loans To City Officials, Payments Of Over \$1 Million With No Explanation, And Various Other Irregularities

Americans For Responsible Leadership Admits Campaign Money Laundering, Discloses \$11 Million Donor

Forensic Audit Reveals Irregularities And Corruption

www.ca-ilg.org



HEADLINE NEWS

Former California State Employee Arrested On Conflict Charges

Judge Orders San Jose To Disclose Officials' Messages On Private Devices

Temecula Water District Part Of 'Secret Society'

Venice Group Requests Ethics Investigation For VNC President

Lawyer Targeting Modesto Over Policy Of Purging Emails After 30 Days

www.ca-ilg.org



HEADLINE NEWS

**State Fines Two Oxnard Officials \$8,500
Over Gift Reporting Violations**

Rubio Faces \$3,500 Conflict-of-interest Fine

Rep. David Rivera Facing Ethics Issues

Mayor's Receipts Probed

Lobbyist For San Manuel Tribe Fined \$30,000

www.ca-ilg.org



HEADLINE NEWS

**In Ethics Probe, Businessman Says Councilman Asked
Him To Lie About Gifts**

D.A.: OC School District Violates Open Meeting Law

**Concerns Mount Over City Council
Member's Conflicts Of Interest**

San Bernardino County Supervisor Arraigned
On Criminal Charge Of Money Laundering

DA: \$102 Million Stolen From Taxpayers

www.ca-ilg.org



HEADLINE NEWS

Four Indicted In Widening County Corruption Probe

**Civil Grand Jury Fines Hughson City Council
Members In Violation Of The Brown Act**

County Execs Enjoy \$1,600 Meal
On Taxpayers' Dime

FPPC Fines Senator \$350,000 For 89 Violations Of The Political
Reform Act – Largest Penalty Of Public Official In FPPC History

Pajaro Valley Unified School District Sued For Alleged
Brown Act Violations

www.ca-ilg.org



HEADLINE NEWS

Rio School Board Sued Over Alleged Closed Door
Brown Act Violation

Lawmaker Hit By 13 Ethics Charges

D.A. Closes Case On Pico Rivera Councilman For
Not Reporting Free Movie Passes

LA City Commissioner Convicted On 14 Of 21 Counts
Of Public Corruption And Bribes

L.A. Mayor Faces Fines Over Free Tickets

www.ca-ilg.org



HEADLINE NEWS

Construction Company And District Officials Indicted
For Diverting \$3.6 Million From Schools

DA's Office Probes QH Water District
Use Of Money For Parties, Luncheons Must Be Justified

Ethics Charges Urged Over Trips; Six Current
And Former L.A. Airport Officials Allegedly
Received Discounted Travel To China, New England

Grand Terrace Councilman Arrested On Felony Conflict
Of Interest Charges

www.ca-ilg.org



Finding Your Way In Public Service

General ethics laws and principles

Four areas of ethics laws

1. Personal Financial Interests
2. Personal Advantages and Perks
3. Transparency Laws
4. Fair Process

Conclusion & Questions



www.ca-ilg.org



California Ethics Laws

Where?

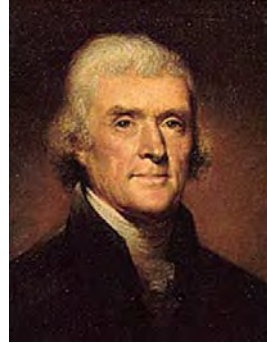
- Statutes & Regulations
- National & State Constitutions

What?

- *Minimum* Legal Standards

Why?

- Power of Government
- Stewards of Tax Dollars
- Public Trust



"When a man assumes a public trust, he should consider himself public property."

www.ca-ilg.org



Principles of Public Service Ethics

TRUSTWORTHINESS

Public Office = Public Trust / Honest Service

FAIRNESS

The Public's Business = Open Government

RESPONSIBILITY

Public Official's Decisions = No Bias
Must Be Merit Based = No Personal Gain
No Conflicts of Interest

RESPECT

Public Confidence = No Appearance of Impropriety

LOYALTY

Public Agency Best Interest = Rejecting Personal & Political Interests

COMPASSION

Attune & Care = Public's Needs & Trust

www.ca-ilg.org



PERSONAL FINANCIAL INTERESTS

www.ca-ilg.org



Personal Financial Interests

1. **Political Reform Act**
 - Disclosure
 - Disqualification
2. **Contracts**
 - Gov. Code § 1090
3. **Revolving Door**
4. **Feathering Your Nest**
5. **Redevelopment**
6. **Bribery/Mail Fraud**



www.ca-ilg.org



POLITICAL REFORM ACT OF 1974 (GOV. CODE § 87100, ET SEQ.)

www.ca-ilg.org



Personal Financial Interests *Political Reform Act of 1974*

General Rule

Public officials shall not:

- make,
- participate in making, or
- attempt to influence a governmental decision in which they have a financial interest.



www.ca-ilg.org



Personal Financial Interests *Political Reform Act of 1974*

WHO IS A PUBLIC OFFICIAL?

A Public Official is every:

- Member
- Officer
- Employee
- and *certain* Consultants of a State or Local Agency.

(Gov. Code. sec. 82048)



www.ca-ilg.org



Personal Financial Interests *Political Reform Act of 1974*

Officials should perform duties solely in the public's interest, not for their own financial interests.



How is this done?

Disclosure
(Form 700)

Disqualification

www.ca-ilg.org



Personal Financial Interests Disclosure

Who?
87200 Filer:
 Elected Officials, Finance Directors, Planning Commissioners, City Attorney

Code Filer:
 Assistant City / County Clerk, Planner, Department Heads, Consultant

How?

- **Use Form 700**

When?

- ✓ Assuming Office
- ✓ Leaving Office
- ✓ Annually, by April 1st

Signed Under Penalty of Perjury

www.ca-ilg.org

Personal Financial Interests Political Reform Act of 1974

Four questions to ask:

1. Is it *reasonably foreseeable* that the decision will have a financial effect on your economic interest?
2. Will the financial effect be *material*?
3. Is the financial effect *indistinguishable* from effect on the *public generally*?
4. If no, absent an exception, you may not make or participate in the decision.

www.ca-ilg.org

Personal Financial Interests
Political Reform Act of 1974

**Identify each economic interest
that will be financially affected
by the decision.**

www.ca-ilg.org



Personal Financial Interests
Political Reform Act of 1974

**For each economic interest
identified, determine if the
financial effect will be “material”
under Regs 18702.1 – 18702.5**

www.ca-ilg.org



Personal Financial Interests
Political Reform Act of 1974

Determine if the financial effect will be “indistinguishable” from effect on the “public generally” as described in Reg. 18703

www.ca-ilg.org



Personal Financial Interests
Political Reform Act of 1974

If *material* financial effect on economic interest is not *indistinguishable* from effect on the *public generally*, you may not make, participate in making or influence the making of the governmental decision, unless an exception can be applied.

www.ca-ilg.org



Personal Financial Interests ***Political Reform Act of 1974***

HYPO:

The Mayor is going to vote to award a construction contract for a city library to a company who employs his sister's husband (brother-in-law) in a top executive position.

Can the Mayor vote on the decision to award the contract?

www.ca-ilg.org



Personal Financial Interests ***Political Reform Act of 1974***

Answer: Yes.

An official has an economic interest in his or her own finances and those of his or her immediate family (spouse and dependent children). A mere sibling relationship is not enough to create a conflict.

www.ca-ilg.org



Personal Financial Interests *Political Reform Act of 1974*

HYPOTHESIS:

The city is considering constructing a hiking trail on city property on the opposite side of a creek which borders the backyard of the residence of a member of the city council.

Can the councilmember vote on the decision to develop the trail?

www.ca-ilg.org



Personal Financial Interests *Political Reform Act of 1974*

ANSWER: No.

An official who has an financial interest of \$2,000 or more in real property may not vote on a matter affecting real property located within 500 feet of the property line of the official's property.

www.ca-ilg.org



Personal Financial Interests *Political Reform Act of 1974*

Types of Economic Interests:

- ✓ Business Investment
- ✓ Source of Income
- ✓ Business Position or Employment
- ✓ Real Property
- ✓ Gifts
- ✓ Personal Finances



www.ca-ilg.org



Personal Financial Interests *Political Reform Act of 1974*

What do we do when a conflict exists?

- **DO NOT** PARTICIPATE IN THE DECISION
- **DO NOT** DISCUSS, GIVE OPINION OR INFLUENCE
- DISCLOSE
- DISQUALIFY



www.ca-ilg.org



INTEREST IN PUBLIC CONTRACTS (GOV. CODE § 1090)

www.ca-ilg.org



Financial Interest in Public Contracts *Government Code § 1090*

If:

- A Public Official
- Who Has a Financial Interest
- Makes A Contract

Then:

- Contract is VOID
- Penalties Apply



Self-Dealing

www.ca-ilg.org



Financial Interest in Public Contracts *Contract Defined*



- Use general contract principles
- Examples:
 - Construction contracts
 - Purchases
 - Development agreements
 - Civil service appointments
 - Grants and donations

www.ca-ilg.org



Financial Interest in Public Contracts *“Making” the Contract*

“Making” includes:



- Negotiations,
- Discussions,
- Reasoning,
- Planning, and
- The “give and take which goes beforehand in the making of the decision to commit oneself”

www.ca-ilg.org



Financial Interest in Public Contracts

Types of Financial Interests

- **Financial Interest**
 - Direct (contracting party)
 - Indirect (related to contracting party)
- **Effect**
 - Positive or negative
- **Certainty not required**



www.ca-ilg.org



Financial Interest in Public Contracts

Two Scenarios

- Member of multi-member legislative body approving contract
- Individual official or advisory board member of agency approving contract



www.ca-ilg.org



Financial Interest in Public Contracts *Legislative Body Member Scenario*

- **Facts:** Council member Jones owns the construction company that has been awarded the contract to remodel City Hall. She recuses herself from participating or voting to approve the contract.
- **Outcome:** The contract is void.



www.ca-ilg.org



Financial Interest in Public Contracts *Employee Scenario*

Facts: A firefighter wants to contract to sell a unique fire protection device to the city's fire department. The decision would be made by the city manager without any input from the employee.



Question: May the contract be made?

www.ca-ilg.org



Financial Interest in Public Contracts *Employee Scenario*

Answer: Yes, if he

- Discloses his interest and
- Disqualifies himself from participating in, or influencing the decision making process.



www.ca-ilg.org



Financial Interest in Public Contracts *Remote Interest Exceptions –* *§ 1090(b)*

- **Requirements:**
 - Public disclosure noted on records
 - No attempt to influence
 - Board acts in good faith
- **16 Exceptions**, including:
 - Employees, in certain cases
 - Suppliers, in certain cases



WARNING!

THESE ARE FACT-SPECIFIC - CHECK WITH YOUR ATTORNEY

www.ca-ilg.org



Financial Interest in Public Contracts “Non-Interest” Exceptions - § 1091.5

- **Requirements**
 - Some do not require disclosure or disqualification
- **14 Exceptions**, including:
 - Corporate ownership
 - Less than 3% of shares, and
 - Income of less than 5% of total
 - Expense reimbursements
 - Recipient of public services



WARNING!

THESE ARE FACT-SPECIFIC - CHECK WITH YOUR ATTORNEY

www.ca-ilg.org



Personal Financial Interests *Interest in Public Contracts*



Ramifications

- Criminal
 - Willful Violation = Felony
- Civil
 - Contract = Void and unenforceable
 - Disgorgement of all money
- Lifetime bar to public office

www.ca-ilg.org



PROPERTY INTERESTS IN REDEVELOPMENT AREAS

www.ca-ilg.org



Personal Financial Interests *Property Interests in Redevelopment Areas*

- **Existing Property Interests**
 - Public official (employee) must disclose
- **New Interests**
 - Public official (employee) who participates in policy-making activities for redevelopment agencies may not acquire property interests in project area (H&S 33130(a))
 - **Successor Agencies**
 - Subject to same rules and restrictions



www.ca-ilg.org



REVOLVING DOOR

www.ca-ilg.org



Personal Financial Interests *“Revolving Door”*



AFTER LEAVING OFFICE:

Elected Official & Agency Head/CEO

- One Year Ban
- Prohibited from appearing before, or communicating with, agency on behalf any other person for compensation

www.ca-ilg.org



“FEATHERING YOUR NEST”

www.ca-ilg.org



Personal Financial Interests *“Feathering Your Nest”*

Influencing Prospective Employment:

No Public Official Shall:

- Participate in decision making process when it relates to any prospective employer.
- UNLESS: An exception applies.



www.ca-ilg.org



BRIBERY

www.ca-ilg.org



Personal Financial Interests *Bribery*

Bribery: The offering, giving, receiving, or soliciting of something of value for the purpose of influencing the action of an official in the discharge of his or her public or legal duties.



www.ca-ilg.org



Difference between a Gift or Political Contribution and a Bribe

- The commonly accepted borderline is that a gift or contribution (money or anything of value) is a bribe if there is proof of a quid pro quo.
- A promise to perform an official act or not.



www.ca-ilg.org



PERSONAL ADVANTAGES AND PERKS

www.ca-ilg.org



Personal Advantages and Perks

- Gifts
- Honoraria
- Travel/Lodging Expenses
- Loans
- Reimbursements
- Nepotism
- Mass Mailings
- Misuse of Public Funds
- Gift of Public Funds

"When public officials are influenced in the performance of their public duties by base and improper considerations of personal advantage, they violate their oath of office ..."

- Terry Barta (1993)

www.ca-ilg.org



Personal Advantages and Perks *Gift Laws*



Meals



Entertainment



Travel

A gift is anything of value that provides a personal benefit for which adequate consideration was not provided.

www.ca-ilg.org



Personal Advantages and Perks *Gift Laws*

Disclose
\$50+

Disqualify
\$470/12mos.

Refuse
\$470+

Bottom Line: Watch your calendar

- Estimate
- Track
- If Gift Exceeds Limit: Return, Pay or Donate

www.ca-ilg.org



Personal Advantages and Perks *Common Exceptions*

- Gifts to public agency
- Gifts returned unused or donor reimbursed within 30 days
- Gifts from family members
- Gifts of hospitality
- Reciprocal exchanges
- Tickets/passes to certain fundraisers
- Acts of neighborliness and human compassion



www.ca-ilg.org



Agency Disclosures Gift to Agencies: Forms 801 & 802

Gift to Agencies: Form 801

- **Know the rules: NEW** - Exceptions on gifts of travel now apply to elected officials and officials specified in Gov. Code § 87200

Tickets: Form 802

- Applies to tickets for entertainment, recreational or similar purpose
- List of Public Purposes
- New Definition of Ceremonial Use
- Written Ticket Policy Required

www.ca-ilg.org



Personal Advantages and Perks Rules of the Road



- Acceptance of passes or discounts from transportation companies is prohibited.
- Informational exception to gift rules does not include travel – exceptions apply.
- Travel may be subject to gift limits. Evaluate on a case-by-case basis – source, purpose.
- Travel paid by using agency funds is totally exempt from limits and disclosure if for agency business.



www.ca-ilg.org



Behested Payments: Form 803

The image shows the top portion of the 'Behested Payment Report' form, designated as a public document. It includes fields for the elected officer's name, agency, and the amount of the payment. The form is titled 'California Form 803'.

FOR ELECTED OFFICIALS ONLY

- Contributions of **\$5,000 or more**
- made by a single source
- in cooperation with elected official
- **Must be reported to official's agency within 30 days.**

www.ca-ilg.org



Personal Advantages and Perks *Gifts Limit Ramifications*



- FPPC civil action
- Penalty: 3 times the amount of the gift
- \$5,000 fine
- 6 months jail
- Bribery/Extortion – Felony – Prison

www.ca-ilg.org



Personal Advantages and Perks *Honoraria are Illegal*



- What are Honoraria?
- To whom do they apply?
- Application
- Exceptions

www.ca-ilg.org



Personal Advantages and Perks *Loans / Reimbursements / Nepotism*



- Personal Loans
- Reimbursement Policy
- Nepotism (Agency Policy)

www.ca-ilg.org



Personal Advantages and Perks *Mass Mailing*

- No mass mailing shall be sent at public expense
- “*Mass Mailing*” means more than 200 substantially similar items sent in a single calendar month, but does not include:
 - A form letter or other mail which is sent in response to an unsolicited request, letter or other inquiry
 - A letter where the name of elected official is only in letterhead or logo and all official's names are same size, font, color and location



www.ca-ilg.org



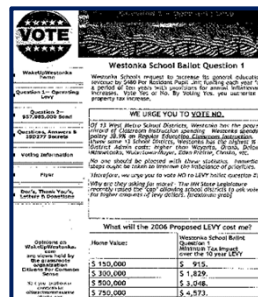
Personal Advantages and Perks *Misuse of Public Funds*



Ballot Measures



Endorsements & Legislative Activities



Informational Materials

www.ca-ilg.org



Personal Advantages and Perks *Gift of Public Funds*



- All expenditures of public funds must have a public purpose.
- Test:
 - Does the expenditure serve the public interest?
 - Is the expenditure authorized?

www.ca-ilg.org



TRANSPARENCY LAWS

(Gov. Code § 54950, et seq.;
Gov. Code § 6250, et seq.; and
California Constitution)

www.ca-ilg.org



Transparency Laws

The Ralph M. Brown Act & The California Public Records Act

Applies to:

- Local agencies
- Legislative bodies
- Meetings
- Persons elected to legislative bodies, even prior to assuming office,
- Certain private organizations



www.ca-ilg.org



Transparency Laws

The Brown Act - Meetings



- What is a meeting?
- When is a meeting not a meeting?

www.ca-ilg.org



Transparency Laws

The Brown Act – Serial Meetings

SERIAL MEETINGS

Use of:

- direct communication;
- intermediaries; or
- technology

to develop a collective concurrence outside of a meeting is expressly prohibited.

E-MAILS

When e-mailing:

- Don't "reply to all"
- Do not take a position or make a commitment
- E-mail board / council info only
- Take caution to ensure compliance with law

www.ca-ilg.org



Transparency Laws

The Brown Act – Rules Governing Meetings

- Regular meeting
- Special meetings
- Emergency meetings
- Adjourned meetings
- Public's right to comment
- Report individual votes or abstentions



www.ca-ilg.org



Transparency Laws *The Brown Act – Closed Sessions*

Must be:

- Expressly authorized
- Briefly described in agenda
- Verbally announced If action is taken, may need to report it to the public and report individual votes or abstentions
- Disclosure of closed session matter is illegal



www.ca-ilg.org



Transparency Laws *The Brown Act*

HYPO:

All five members of a water district board are attending the ACWA legislative conference in D.C. Three of the members would like to visit the District's congressional representatives.

If all three go, and they discuss a federal policy, has there been a Brown Act violation?

www.ca-ilg.org



Transparency Laws *The Brown Act*

Answer: No.

Meeting Location Exception: Three members can meet with a congressman at the same time under Gov. Code § 54954(b)(5)

Best Practices:

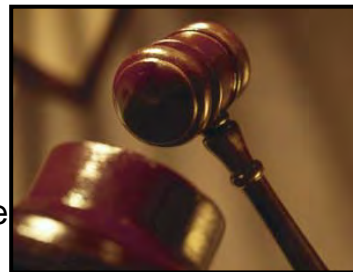
- Post a special meeting notice at the District office and online.
- Meeting to be held in a location accessible to the public.

www.ca-ilg.org



Transparency Laws *The Brown Act - Ramifications*

- For violations, Court may:
 - Enjoin action,
 - Invalidate action, or
 - Mandate correction.
- Court costs and attorney fees are recoverable
- Individuals who intentionally violate may be guilty of a misdemeanor



“Secrecy is for losers”

-U.S. Senator Patrick Moynihan

www.ca-ilg.org



Transparency Laws *California Public Records Act (CPRA)*

- Every person has a right to inspect public records of any state or local agency.
- What is a public record?
 - Any writing containing information related to the conduct of the public's business retained by any public agency



www.ca-ilg.org



Transparency Laws *California Public Records Act*

Handling Requests

- Public records must be available during office hours.
- Agencies must make copies of disclosable records “promptly available”...“upon request.”
- Agency shall:
 - Within 10 days: Determine disclosable records
 - Within 14 days: Request time extension for “unusual circumstances”

Hours
Monday 8AM—5PM
Tuesday 8AM—5PM
Wednesday 8AM—5PM
Thursday 8AM—5PM
Friday 8AM—3PM



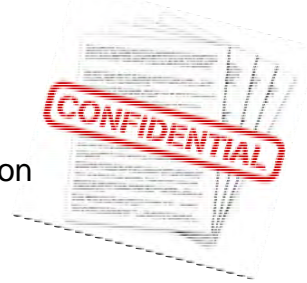
www.ca-ilg.org



Transparency Laws *California Public Records Act*

When is a public record exempt from disclosure?

- Preliminary drafts, notes or memos not kept in ordinary course of business
- Real estate appraisals
- Personnel, medical, similar files
- Records about pending litigation
- Records pertaining to an investigation
- Deliberative process
- Catch-all exemption



www.ca-ilg.org



Transparency Laws *California Public Records Act*

E-mails & Text Messages:

- User beware - using personal equipment or accounts may not protect from disclosure
- Open question – *City of San Jose v. Superior Court (Smith)* pending before California Supreme Court

www.ca-ilg.org



Transparency Laws *California Public Records Act*

Best Practices

- Always respond to requests
- Adopt regulations
- Adopt a policy
- Develop standardized fees



www.ca-ilg.org



FAIR PROCESS

www.ca-ilg.org



Fair Process

- Due Process/Bias
- Competitive Bidding
- Incompatible Offices
- Incompatible Activities



www.ca-ilg.org



Fair Process Due Process



The Oath of Allegiance

- What does Due Process mean?
 - Notice
 - Opportunity to be heard
 - Fair and impartial decision-maker
- Due Process concerns
 - Specific prejudice against topic.
 - Specific bias against persons affected.
 - Lack of impartiality.

www.ca-ilg.org



Fair Process *Competitive Bidding*

- Purposes
- General Rule
 - Only when required by statute or ordinance
 - Lowest, responsive, responsible bidder
 - Thresholds for public works
- Exceptions



www.ca-ilg.org



Fair Process *Incompatible Offices Doctrine*



- Elements:
 - Official holding two public offices simultaneously
 - Conflicting or overlapping functions
- Ramifications

www.ca-ilg.org



Fair Process *Incompatible Activities*



- Applies to officers and employees
- Agency may prohibit activities involving:
 - Private gain or advantage
 - Receiving consideration for performing duties
 - Acts outside scope of employment
 - Impairment of efficiency
- Attorney exception

www.ca-ilg.org



Fair Process *Campaign Finances*

CAN AN ELECTED OFFICIAL BE DISQUALIFIED FROM VOTING/DECISION-MAKING FOR RECEIVING CAMPAIGN CONTRIBUTIONS?

- General Rule – NO.
Campaign Disclosure Forms Sufficient = NO Disqualification (e.g., campaign contribution from a developer)
- “BIG” Exception
(Gov. Code § 84308)

Proceedings involving entitlements, licenses/permits (land use permits, franchise, zoning variances, consulting contracts)



www.ca-ilg.org



Fair Process

Best Practices for Decision-Makers

- If you can't be fair, don't participate
- Avoid statements before the close of a hearing
- Make decisions based on administrative record
- Avoid the appearance of bias
- Pay attention
- Above all, you will be judged by your fairness and integrity



www.ca-ilg.org



Conclusion

Finding Your Way – Ethics Laws

Summary of 4 Major Areas

Personal Financial Interest

1. Political Reform Act
2. Contracts
3. Revolving Door
4. Feathering Your Nest
5. Redevelopment
6. Bribery/Mail Fraud

Personal Advantages & Perks

1. Gifts
2. Honoraria
3. Travel/Lodging Expenses
4. Loans
5. Reimbursements
6. Mass Mailings
7. Misuse of Public Funds
8. Nepotism
9. Charity Fundraising Disclosure

Transparency Laws

1. Brown Act
2. Public Records Act

Fair Process

1. Due Process
2. Bias
3. Competitive Bidding
4. Incompatible Offices
5. Incompatible Activities
6. Campaign Finances
7. Best Practices

www.ca-ilg.org



Ethics Laws

California's ethics laws set the minimum standards for public service



"In civilized life, law floats in a sea of ethics"

- US Supreme Court Justice Earl Warren 1964



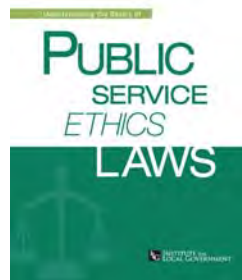
"We are what we repeatedly do. Excellence, then is not an act, but a habit."

-Aristotle

www.ca-ilg.org



ILG Thanks our Partner's



Please visit ILG's website at www.ca-ilg.org for more available resources such as, "*Understanding the Basics of Public Service Ethics Laws,*" and "*Ethics Law Principles for Public Servants: Key Things to Know.*"

The Institute also provides AB 1234 certification via online or onsite training. Contact ILG (ethicsmailbox@ca-ilg.org) for more information on how to schedule an ethics workshop in your area.

www.ca-ilg.org



ILG Thanks our Partner's

Gage C. Dungy, Partner
Liebert Cassidy Whitmore
(916) 584-7000
gdungy@lcwlegal.com

 LIEBERT CASSIDY WHITMORE

Eric S. Vail, Partner
Burke, Williams & Sorensen, LLP
(951) 801-6625
EVail@bwslaw.com


BURKE, WILLIAMS & SORENSEN, LLP

www.ca-ilg.org

